



The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia SC 29210

December 6, 2018

Re: Docket numbers: 2018-322- E and 2018-321-E- Letter of support for the Application of Duke Energy Progress, LLC and Duke Energy Carolinas for Approval of Proposed Electric Transportation Pilot and An Accounting Order to Defer Capital and Operating Expenses.

EVBox Inc., North America appreciates the opportunity to comment on of Duke Energy Progress, LLC and Duke Energy Carolinas (collectively 'Duke') proposed pilot programs. EVBox is headquartered in Netherlands and is a manufacturer of Electric Vehicle (EV) charging equipment and related cloud-based services with an installed base of over 60,000 Level 2 and 700 DC fast chargers, in 45 countries. EVBox was acquired by the European utility ENGIE in 2017. EVBox continues to make strides in North America. It was selected by the California utility, Pacific Gas and Electric Company (PG&E), as the first supplier for the utility-owned portion of the EV Charge Network program. The contract includes EVBox installing up to 2,560 stations and 10 years of network services in PG&E territory.

Duke's proposed pilot programs are a mix of prudently priced offerings to gain learnings to accelerate transportation electrification and are necessary to facilitate changes in the automotive sector. There are currently 3000 electric vehicles<sup>1</sup> on the road in South Carolina. While the number is small, the number of EVs has grown dramatically by 882% since 2011. It is therefore imperative that the state of South Carolina provide a charging infrastructure that enables customers to make a choice to drive electric. Lack of access to charging stations and range anxiety are two of the most common reasons that deter customers from exercising this choice to go electric even if the reduction in fuel costs and maintenance can make EVs a more attractive economical proposition.

EVBox supports the residential charging program in in which Duke will provide a rebate and ongoing quarterly participation payments for up to 400 residential customers installing Level II chargers in exchange for utility management of home charging during defined hours. Managed charging allows a utility to remotely control vehicle charging to better correspond to the needs of the grid, much like

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<sup>1</sup> <https://autoalliance.org/energy-environment/advanced-technology-vehicle-sales-dashboard/>



traditional demand response programs. California utilities like SCE and SDG&E have been administering similar pilots. Residential charging can more than double the load of a residential customers. The learnings from this pilot can help design a larger residential program which will ensure customer benefits in the form of charging at the most economical time and utility benefits in the form of better grid management

Duke proposes to install, own and operate up to twenty DC Fast Charging (DCFC) stations across its territory to provide a foundational level of infrastructure and facilitate EV market growth. EVBox supports this proposal. The proposed pilot attempts to explore optimum price signals and the learnings from this pilot could benefit the broader industry.

We urge the Commission to approve this application and believe that that will lead to increased long-term EV adoption for all customer classes and all EV charging technologies.

Sincerely,

Megha Lakhchaura

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EVBox, North America

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